

Evan J. Spelfogel
Robyn Ruderman
Epstein Becker & Green, P.C.
250 Park Avenue
New York, New York 10177-1211
(212) 351-4500
Attorneys for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

-----	X	
LUANN P. GOULD,	:	
	:	05 CV 11118 (PBS)
Plaintiff,	:	
	:	
– against –	:	(ECF FILING)
	:	
LUCENT TECHNOLOGIES, INC.,	:	
	:	
Defendant.	:	
	:	
-----	X	

**DEFENDANT'S MOTION FOR
AN EXTENSION OF TIME**

With the consent of Plaintiff's counsel, Robert Thomas, Defendant Lucent Technologies, Inc. respectfully requests a five-day extension of time to move for reconsideration of this Court's October 30, 2006 Order denying, in part, Defendant's motion for summary judgment. The motion is currently due on November 15, 2006. Should Defendant's request for an extension be granted, the new due date will be November 20, 2006.

This extension of time is being requested because Lucent's counsel was on trial for the past two weeks and needs additional time to finalize the motion.

EPSTEIN, BECKER & GREEN, PC

By: s/Robyn Ruderman
Evan J. Spelfogel
Robyn Ruderman (admitted pro hac vice)
250 Park Avenue
New York, NY 10017
(212) 351-4500
Attorneys for Defendant

Robert Thomas
184 Pleasant Valley Street, Suite 1-204
Methuen, MA 01844
(978) 686-9800
Attorneys for Plaintiff

Dated: November 15, 2006